







**CORPORATE OFFICES**

SOUTHWOOD J. MORCOTT  
CHAIRMAN, PRESIDENT AND  
CHIEF EXECUTIVE OFFICER

May 28, 1993

Zubeida Moorjani, MD  
500 Riverside Drive  
Rossford, OH 43460

Dear Dr. Moorjani:

Thank you very much for your letter regarding the St. John's High School news article on my thoughts about the Jesuit School.

I also appreciate you sending me the resume on your son, Deepak. He certainly looks like an outstanding young person. I would suggest that the next time he is in Toledo for the holidays, you ask him to give us a call, as we would be happy to chat with him about his career objectives and aspirations.

Thank you again for your note.

Sincerely,



Southwood J. Morcott

SJM/gc

cc: Carl Hirsch  
Deepak G. Moorjani

"Kohlenberg, Kerstin" <Kerstin.Kohlenberg@zeit.de>

May 13, 2009 2:03 PM

To: DEEPAK

AW: Links to Articles

Hi Deepak,

oh yes, I read them and after that went to your scribt-page and read everything that is there.

What you discovered at Deutsche Bank in regards to almost 100percent loans and the connection to bonuses is exactly what apparently happened at Hypo Real Estate (only that they offered 160 percent commercial real estate loans which in German is actually against the law. I am researching that story right now) so I am a little familiar with the topic. I just did a story about Merkel and her advisers and how badly their bank-overview functions. (<http://www.zeit.de/2009/15/DOS-Kanzleramt>)

I believe what you discovered in a heartbeat. I think your demands for better risk management and a different incentive structure need more audience - and connected with that very case that you are presenting, it would make a big, big story. I write 8000 word features (kind of like a New York times Magazine Story) and I would very much write about you and the case you are making. There are a lot of people out there that demand change, but there is you who can show how rotten the system still is, and how the managers say one thing to the media and something else to people like you.

The fact that your letter was ccd to Angela Merkel makes it even more interesting, because I could confront her with it, and ask about her real interests in changing the system ( like she said on the G20 summit)

So any clue when you will be back in New York?

Kerstin

-----Ursprüngliche Nachricht-----

Von: DEEPAK MOORJANI

Gesendet: Mi 13.05.2009 18:50

An: Kohlenberg, Kerstin

Betreff: Links to Articles

Hi Kerstin,

Have you read these articles? If so, I'd welcome your thoughts.

A.

B.

Deepak

On May 14, 2009, at 12:57 AM, Kohlenberg wrote:

Deepak,

That's really unfortunate. When so you come back to the States?

Kerstin

Am 13.05.2009 17:51 Uhr schrieb "DEEPAK MOORJANI" unter

Hi Kerstin,

Unfortunately, I am stuck in Asia. Hearings are discontinuous, and I'm not sure when the next hearing will be. The April hearing was public, but most are closed hearings (including this Friday's hearing).

I'll recommend that we "meet" via videoconference. It's the next-best alternative and better than a phone call. Maybe even this weekend.

Thanks,  
Deepak

On May 14, 2009, at 12:10 AM, Kohlenberg wrote:

Hi Deepak,

Thanks again. Just two quick questions in order to plan my trip next

week:  
Would it be possible to meet sometime next week in New York? Is the hearing on Friday public?

All the best from Hamburg

Kerstin

Am 13.05.2009 15:53 Uhr schrieb "DEEPAK MOORJANI" unter [deepak.moorjani@timesinvest.com](mailto:deepak.moorjani@timesinvest.com):

Hi Kerstin,

As background, please review my background (attached). My training and experience as an investor have allowed me to travel this path.

I'll be in touch shortly.

Thank you.

Deepak

On May 13, 2009, at 9:07 PM, Kohlenberg wrote:

Deepak, thanks a lot for the quick response.  
Talk to you soon, Kerstin

Am 13.05.2009 14:01 Uhr schrieb "Deepak Moorjani" unter [deepak.moorjani@timesinvest.com](mailto:deepak.moorjani@timesinvest.com):

Hi. Thank you for the note. We are preparing for a hearing on Friday.  
I will be on touch soon. Deepak

Sent from my handheld device.

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<http://www.zeit.de/>

*a memo from the desk of*  
**Deepak Moorjani**

Wednesday, December 8, 2021

Adult Protective Services  
Health and Human Services Agency  
County of San Diego  
1600 Pacific Hwy #206  
San Diego, CA 92101

to: Adult Protective Services  
subject: Zubeida Moorjani, MD  
San Diego Superior Court Case No. 37-2021-00033119-CU-OR-CTL

On November 19, 2021, I called Adult Protective Services ("APS") in San Diego to request an investigation on the elder abuse of Zubeida Moorjani. My mother is an elder person who is a retired medical doctor.

On November 19, 2021, I spoke with Pam (intake) at 800.399.2021. Based on our conversation, Pam believed that an investigation would commence based on (i) emotional abuse and (ii) financial abuse. On November 19, 2021, I mailed written information to APS in San Diego, and this letter provides additional information.

***Adult Protective Services: San Diego and Lucas County***

On May 25, 2021, I contacted APS in San Diego. My desired outcome was to move my mother from her house in Lucas County, Ohio to her house in San Diego County, California.

On May 25, 2021, I spoke with Tiffany of APS in San Diego, and she provided guidance on the issues that APS considers in its investigations.

My mom is an elder with the following issues

- A medical condition (e.g. high blood pressure)
- A recent hospitalization (e.g. broken pelvis)
- A person who is unable to manage her finances (e.g. pay her bills, balance her checkbook).
- A person who has had previous interventions (e.g. Notification: Suicide Risk on January 10, 2019).

At the time, my mother was living in Lucas County, Ohio; therefore, Tiffany with APS in San Diego suggested that I contact APS in Lucas County, Ohio.

On May 25, 2021, I filed a report with Colleen of APS in Lucas County, Ohio for (i) neglect and abandonment and (ii) financial abuse.

These issues are described in the First Amended Complaint filed in San Diego Superior Court Case No. 37-2021-00033119-CU-OR-CTL. The First Amended Complaint is item #14 in the Register of Actions, and the First Amended Complaint contains information and exhibits which may assist APS of San Diego's investigation.

**Personal Contacts in San Diego County**

In San Diego, Zubeida Moorjani's contacts are

1. John Alessio. c/o Procopio, Cory, Hargreaves & Savitch, LLP. 525 B Street, Suite 2200, San Diego, CA 92101. (619) 238-1900. john.alessio@procopio.com
2. Manisha Moorjani. c/o Gossamer Bio. 3013 Science Park Road, Suite 200, San Diego CA 92121. (858) 684-1300. ~~Manisha.Moorjani@gossamerbio.com~~
3. Seema Moorjani. 11881 Cypress Valley Drive, San Diego, CA 92131. ~~Seema.Moorjani@seemamoorjani.com~~
4. Sunil Moorjani. 11881 Cypress Valley Drive, San Diego, CA 92131-3762. ~~Sunil.Moorjani@seemamoorjani.com~~

**John Alessio (Bar No. 174900), Procopio, Cory, Hargreaves & Savitch, LLP**

Additionally, I would like APS of San Diego to investigate John Alessio (Bar No. 174900) for elder abuse. As a member of the California bar, John Alessio is currently the managing partner of Procopio, Cory, Hargreaves & Savitch, LLP ("Procopio").

John Alessio and Sunil Moorjani are former classmates at the University of San Diego Law School ('94), and John Alessio may have allowed a personal relationship to compromise his legal judgment. As a member of the California bar, John Alessio should have recognized the conflict of interest, and he should have declined to represent the defendants.

The attached Notification: Suicide Risk is dated January 10, 2019, and this letter was sent via certified mail to Rosemarie Osowik, MD with a cc: to Jennifer Compton of Sun Federal, Louise Jackson of Eastman & Smith, and Sunil Moorjani. Additional, this letter was sent via certified mail to Thomas Osowik, a judge in the Ohio Sixth District Court of Appeals.

Despite the filing of the First Amended Complaint, John Alessio and Procopio have still failed to recuse themselves; consequently, I filed a Notice of Motion and Motion to Disqualify, a Memorandum of Points and Authority, and a Declaration of Plaintiff. The San Diego Superior Court Case No. 37-2021-00033119-CU-OR-CTL is being heard in C-65 by Honorable Ronald F. Frazier.

In the Motion to Disqualify, John Alessio and Procopio's emails have been produced, and John Alessio and Procopio's emails show that they have consistently sought to force a dismissal with prejudice. However, John Alessio has client relationships with Gulab Moorjani, Seema Moorjani, Sunil Moorjani and Zubeida Moorjani.

In his November 30, 2021 email (attached), one of John Alessio's junior associates admits that the First Amended Complaint has been filed; however, the junior associate (Zagros Bassirian, Bar No. 299581) is actively soliciting a settlement proposal.

Note: The First Amended Complaint was served to the defendants directly via USPS certified mail. USPS tracking information (#70163010000034555499) shows: (i) on November 22, 2021 at 8:48am, the package was "Held at Post Office, At Customer Request," (ii) on November 26, 2021 at 12:11pm, the package was not delivered but "Notice Left (No Authorized Recipient Available)", and (iii) on November 27, 2021, the package was not delivered but "The customer has requested that the Postal Service redeliver this item on November 29, 2021 in SAN DIEGO, CA 92131."

Thank you for your kind attention.

cc: Brigid Heid, Eastman & Smith  
cc: Lynn Balshone Jacobs  
cc: Manisha Moorjani, Gossamer Bio  
cc: Soueja Kummar, S.K. Financial, LLC

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***Notification: Suicide Risk***

Via Certified Mail

Rosemarie Osowik, MD  
4041 Sylvania Ave., Suite 204  
Toledo, Ohio 43623

Dear Rosemarie,

On January 08, 2019, Jennifer Compton of Sun Federal visited Mom at 6036 Quarry's Edge Lane, and Mom stated, "I should just commit suicide."

The possibility of suicide should never be underestimated, and this is a direct cry for help. In Jennifer Compton's opinion, "She cannot stay in Toledo."

The working plan is for Mom to stay at her house in San Diego at 11881 Cypress Valley Drive, San Diego, CA 92131. During this two-month period, we will work on a longer-term plan, since Mom cannot live alone. She is lonely and depressed, and she is not able to make her own decisions. Most likely, Mom should move to an assisted-living facility, preferably in San Diego.

Jennifer Compton is director of business development at Sun Federal Credit Union, and she has advised my Mom on her financial affairs for approximately two decades. She is cc'd to this letter, and her phone number is 419.794.7482. She may contact you directly.

Sincerely yours,

*Deepak*

Deepak Moorjani

cc:

Jennifer Compton, Sun Federal Credit Union  
Louise A. Jackson, Eastman & Smith  
Sunil Moorjani

NOTIFICATION: SUICIDE RISK

## Jim Maser

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**From:** profferg <profferg@aol.com>  
**Sent:** Wednesday, October 13, 2021 11:15 PM  
**To:** Jim Maser  
**Subject:** Re: referral

Hi Jim. It's great to hear from you, as always. It would be great to see you again. We're leaving 10/20 for 3 weeks in Italy, but will be back 11/12--so anytime after that.

Re: your friends: the first thing to do is to report the situation to Adult Protective Services in the County in which the parents live. Here are the links for Alameda and Contra Costa Counties, respectively:

<https://www.alamedacountysocialservices.org/our-services/Abuse-and-Protection/adult-and-senior-abuse/index>

<https://www.contracosta.ca.gov/914/Adult-Protective-Services>

Re an attorney to help: I'd suggest you contact Kathryn Korn in Orinda. Here's the link to her website:

<https://www.kornlawgroup.com/>

I hope this helps. Let me know if you have other questions.

Warmest regards, Mike

-----Original Message-----

From: Jim Maser <Jim.Maser@picanteberkeley.com>  
To: profferg <profferg@aol.com>  
Sent: Wed, Oct 13, 2021 6:28 am  
Subject: referral

Hey Mike,

Hope all is well with you and your family.

I am beginning to remodel Picante today. Not sure how all this will roll out.

Do you have a referral for a lawyer who specializes in elder care abuse?  
Parents I know have kids who are bad actors, and they need help.

Thanks, and I hope it's sooner than later that I see you again.

Best,  
Jim



Oriet Cohen-Supple <[REDACTED]>  
Resent-From: [REDACTED]  
To: Deepak Moorjani <[REDACTED]>  
Fwd: Moorjani: Confirmation of Extension (October 18, 2021)

November 30, 2021 1:15 PM

[REDACTED]  
[REDACTED]

Oriet Cohen-Supple, Partner  
Cell: 1-510-495-5749

Begin forwarded message:

**From:** "Bassirian, Zagros S." <[REDACTED]>  
**Date:** November 30, 2021 at 1:03:34 PM PST  
**To:** Oriet Cohen-Supple <[REDACTED]>  
**Cc:** "Turpin, Melissa Avitia" <Melissa.Turpin@procopio.com>, "Alessio, John D." <john.alessio@procopio.com>, Mary Wright <mary@wrightandsupple.com>  
**Subject:** RE: Moorjani: Confirmation of Extension (October 18, 2021)

Oriet –

Hope all is well. We did not receive the proposal you mentioned in October, and while I see the FAC was filed on 11/22, we were not served with a copy. Please let us know the status of this case and whether you intend to serve the FAC. Thank you.

Best,

**ZAG S. BASSIRIAN**  
ASSOCIATE  
PROCOPIO

P. 619.906.5759 | F. 619.744.5478 | zag.bassirian@procopio.com  
525 B STREET, SUITE 2200, SAN DIEGO, CA 92101  
[View Profile](#) | [LinkedIn](#) | [procopio.com](#)

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**From:** Oriet Cohen-Supple <oriet@wrightandsupple.com>  
**Sent:** Thursday, October 21, 2021 9:14 AM  
**To:** Bassirian, Zagros S. <zag.bassirian@procopio.com>  
**Cc:** Turpin, Melissa Avitia <Melissa.Turpin@procopio.com>; Alessio, John D. <john.alessio@procopio.com>; Mary Wright <mary@wrightandsupple.com>  
**Subject:** Re: Moorjani: Confirmation of Extension (October 18, 2021)

**\* EXTERNAL EMAIL - Please use Caution. \***

As to a proposal, I will reach out next week via email. Stay tuned.

Oriet Cohen-Supple, Partner  
Cell: 1-510-495-5749

On Oct 21, 2021, at 9:12 AM, Bassirian, Zagros S. <zag.bassirian@procopio.com> wrote:

Good Morning, Oriet –

Understood. Please confirm our clients need not respond to the complaint and your client will not seek a default in the interim.

On resolution, I believe you were going to make a proposal. Please do that under separate cover.